



WV Balance of State Continuum of Care: Monitoring Policies and Procedures

Overview and Purpose of CoC monitoring

Monitoring is the primary way by which the HUD Field Office in Pittsburgh ensures that the programs funded under the Continuum of Care (CoC) are carried out efficiently, effectively, and in accordance with the CoC Interim Rule. The purpose of the West Virginia Coalition to End Homelessness's (WVCEH) monitoring for CoC-funded projects under the Balance of State is to provide a comprehensive review of most areas that HUD will monitor should the project be selected for Field Office review and ensure that programs are effectively serving their purpose through improving the lives of the people we serve. Monitoring by WVCEH allows staff to be aware of changing factors within the community and within the project that may impact the overall CoC performance. WVCEH views monitoring as a collaborative partnership with agencies that results in positive growth for the CoC's homeless response system. WVCEH monitoring as an on-going technical assistance process by which WVCEH works collaboratively with the grant-funded project to ensure performance meets CoC-established benchmarks. If performance and administration of the grant(s) does not meet benchmarks or HUD established guidelines, technical assistance and guidance will be provided to strengthen program performance to improve housing outcomes for the entire CoC. Often, WVCEH provides both monitoring and some sort of training to front-line staff on best practices at the same time.

The WV BoS CoC Monitor from WVCEH travels to CoC funded agencies throughout the 44 rural counties in the BoS to conduct annual monitoring visits. These visits are scheduled in advance via email with program leadership in an effort to allow agencies to prepare and be aware of any upcoming expectations. If an agency is also funded under the Emergency Solutions Grant (ESG), both WVCEH and the WV Community Advancement and Development (WVCAD) Office will coordinate co-monitoring.

In an effort to understand which programs in our CoC are utilizing best practices and procuring the highest outcomes, results of program monitoring will be evaluated on a 100-point scale. If a question on the scorecard is not applicable to the CoC-funded project being evaluated, the total points amount of available points for that particular section will decrease. The final score will be a percentage of the project's available points. Programs that receive lower scores (75% and below) will be required to complete a quality improvement plan. In contrast, programs that illustrate high-quality outcomes, compliance with best practices and procedures, and receive higher scores (76% and above) will not be required to complete a quality improvement plan. Programs will be informed of their score within 30 days of their most recent evaluation. The scoring details will be provided to the CoC NOFA Competition Rating and Ranking Committee.

Scope of Review

Using Chapters 29 & 34 of the [CPD Monitoring Handbook 6509.2](#), WVCEH monitor reviews the following performance of CoC-funded projects by each of the following components:

- Overall Grant Management
- Homeless Documentation/Recordkeeping Requirements
- Permanent Supportive Housing (PSH) Program Requirements
- Rapid Rehousing (RRH) Program Requirements

- Transitional Housing and Rapid Rehousing (TH-RRH) Joint Component Program Requirements
- Supportive Services Only (SSO) Program Performance and System-wide Impacts
- Homeless Management Information System (HMIS) Program Requirements
- CoC Planning Program Requirements
- CoC Financial Management, Cost Allowability, and Match Requirements

In addition to completing a review of the above components using the CPD guide Chapters 29 & 34, WVCEH monitor will also complete a comprehensive review of the following documents to gauge whether programs are low-barriers and are providing support to program participants to promote long-term sustainability:

- Participant intake procedures and documents
- A sampling of client files from the selected fiscal year

Definitions

Balance of State (BoS) – Geographical areas throughout a state that are not covered by other continuums.

Chronically Homeless – An individual who:

1. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter;
2. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions totaling 12 months or more in the last 3 years; and
3. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria (*listed above*) of this definition [as described in 24 CFR Parts 91 & 578 of the CoC Final Rule], before entering that facility;

A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria (*listed above*) of this definition [as described in 24 CFR Parts 91 & 578 of the CoC Final Rule], including a family whose composition has fluctuated while the head of household has been homeless.

Continuum of Care (CoC) – A regional or local planning body that coordinates housing and services funding for homeless families and individuals. A CoC is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

CoC Lead Agency – Agency that is designated to carry out the activities of the CoC or grant including fiscal and compliance activities. Regular administrative tasks may include, but are not limited to: management

of the annual HUD application, coordination of other funding opportunities, project and system monitoring, meeting management, etc. WV Coalition to End Homelessness is the CoC Lead Agency for the BoS CoC.

Coordinated Entry – “A centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals across a geographic area. The Coordinated Entry system covers the geographic area (designated by the CoC), is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.” [as described in 24 CFR Section 578.3 and further detailed in CPD-17-01.] It is the responsibility of each CoC to implement Coordinated Entry in their geographic area.

Department of Housing and Urban Development (HUD) – The Federal Agency that oversees the CoC Emergency Solutions Grant (ESG) Programs.

Disabling Condition – (1) a condition that: (i) is expected to be long-continuing or of indefinite duration; (ii) substantially impedes the individual’s ability to live independently; (iii) could be improved by the provision of more suitable housing conditions; and (iv) is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post- traumatic stress disorder, or brain injury; or (2) a development disability, as defined above; or (3) the disease of Acquired Immunodeficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for Acquired Immunodeficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV). 24 CFR 583.5.

Diversion – A strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to permanent housing. Diversion programs can reduce the number of families becoming homeless, the demand for shelter beds, and the size of program wait lists.

Homeless – Defined by the McKinney-Vento Homeless Assistance Act as:

- Category 1 - An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low- income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- Category 2 - An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- Category 4 - Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic or life-threatening conditions that relate to violence against the individual or a family member, including a child, that

has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other safe residence; and (iii) Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other safe permanent housing. 24 CFR 578.3.

- Persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph (4) of the homeless definition at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act and may be eligible for certain forms of homeless assistance under the CoC Program, subject to other restrictions that may apply. HUD considers human trafficking, including sex trafficking, to be "other dangerous or life-threatening conditions that relate to violence against the individual or family member" under paragraph (4) of the definition of homeless at 24 CFR 578.3 and "other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized" under section 103(b) of the McKinney-Vento Homeless Assistance Act.

Homeless Management Information System (HMIS) – A local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. The information system designated by the Continuum of Care must comply with the HMIS requirements prescribed by HUD. The HMIS used in West Virginia Statewide HMIS Implementation, which includes all four CoCs, is ServicePoint.

Household – Covers any configuration of persons seeking services (e.g. Households with children, Households without children, Households with only children).

Housing Interventions – Housing programs and subsidies; these include transitional housing, rapid rehousing, and permanent supportive housing programs, as well as permanent housing subsidy programs (e.g. Housing Choice Vouchers).

Homeless System – All of the services and housing available to persons who are literally homeless.

Housing Prioritization Guide – A guide listing persons experiencing homelessness in the CoC who are prioritized for housing. This guide is maintained in HMIS and divided into the 8 CoC regions to promote regional coordination of services. Coordinated Entry staff oversee the guide along with a larger list of individuals engaged in services who may need additional information before connecting with appropriate housing interventions. Emergency Shelter and Street Outreach staff should work closely with Coordinated Entry to engage those not yet connected and to maintain contact with those already on the list.

Housing with Supports – An approach that connects individuals and families experiencing homelessness to permanent housing as quickly as possible, while also providing supportive services that promote housing stability and overall well-being. Services may include assistance with health care, employment, or other needs identified by the household. The focus is on ensuring that people are not only housed, but also have access to the supports necessary to maintain long-term stability and reduce the likelihood of returning to homelessness.

Non-HMIS Housing Prioritization Guide – A Housing Guide that uses anonymous, unique identifiers in order to accommodate domestic violence survivors and other households that do not consent to sharing their information in HMIS.

Permanent Supportive Housing (PSH) – Community-based housing in which supportive services are provided to assist homeless persons with a disability to live independently. This project type equips participants with services tailored to their disability-related needs, enabling sustainable independent living. This assistance is subject to the definitions and requirements set forth in 24 CFR 578.3.

Personally Identifiable Information (PII) – Any information about an individual, maintained by an agency, which can be used to distinguish, trace, or identify an individual’s identity, including personal information which is linked or linkable to an individual.

Prioritization – Ensures that those persons with the greatest need and vulnerability receive the supports they need to resolve their housing crisis.

Program Standards – A set of expectations developed by program funders/grant recipients across the state for each project type, based on HUD guidance and best practices, that the CoC-funded agencies, and other agencies funded through federal partners, are required to follow.

Project – Housing and/or supportive services intended to help people exit homelessness and sustain housing.

Provider – Organizations that serve program participants experiencing homelessness in projects funded by the CoC Program, ESG Program grants, and other private/public resources. This includes grant recipients and sub-recipients.

Rapid Re-Housing – An intervention designed to help individuals and families exit homelessness as quickly as possible, return to permanent housing, and achieve stability in that housing. Services provided are tailored to the needs of each household and focused on achieving financial independence, promoting community connection, and enhancing overall well-being. The core components of a Rapid Re- Housing program are housing identification and relocation, short- and/or medium- term rental assistance and move-in (financial) assistance, and case management and housing stabilization services. This assistance is subject to the definitions and requirements set forth in 24CFR§576.2 “Homeless” paragraph (1) and paragraph (4) who are residing in a place set forth in (1), 24CFR§576.105, 24CFR§576.106 and 24CFR§576.400. (24CFR§576.104 & *Core Components of -Re-Housing*, National Alliance to End Homelessness)

Service Prioritization Decision Assistance Tool (SPDAT) – An evidence-based assessment utilized by all trained CoC providers in either enacting more detailed determinations of acuity for housing placement and/or ongoing use in case management to ensure housing stabilization. The SPDAT (or “Full SPDAT”) has an individual, family, and transition age youth tool. Staff must be trained by OrgCode Consulting or Balance of State CoC staff to use the SPDAT. The SPDAT can be completed on paper or in HMIS and attached to a client record.

Transitional Housing (TH) – A form of temporary housing in which participants sign a lease or occupancy agreement. Transitional Housing is designed to provide supportive services and interim stability to individuals and families experiencing homelessness, with the primary objective of assisting households in successfully transitioning to permanent housing as quickly as possible, and within a maximum of 24 months 24 CFR 578.3. There are no stand-alone TH projects currently funded through the CoC. However,

there are several joint TH-RRH projects funded to support youth and survivors of domestic violence operated throughout the BoS.

Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) – An evidence-based Prescreen utilized by all projects in the WV Balance of State CoC to determine initial acuity and utilized for housing triage prioritization and housing placement.

WV Coalition to End Homelessness (WVCEH) – The organization that acts as the state advocacy body for issues of homelessness in West Virginia. WVCEH is the CoC Lead/Collaborative Applicant and HMIS Lead for the BoS, the SOAR State Lead, and a direct service provider of street outreach, housing location and stabilization services throughout the 44-county catchment area.

WV Community Advancement and Development Office (WVCAD) – The recipient of ESG funds from HUD and the administrator of several other state and federal programs designed to improve the quality of life in West Virginia (e.g., HOPWA, CDBG, CSBG, Weatherization Assistance Program, etc.).

Youth – Persons aged 24 and younger.

1. Unaccompanied Youth – persons who are age 24 or younger, who are not part of a family with children, and who are not accompanied by their parent or guardian during their episode of homelessness. This also includes two or more youth age 24 or younger who are presenting together as a family without children.
2. Pregnant or Parenting Youth – persons who are 24 and younger who are the parents or legal guardians of one or more children who are present with or sleeping in the same place as that youth parent, or who are pregnant.
3. Transition Age Youth – persons between age 18 and 24 who are transitioning from childhood to adulthood.

Youth Homelessness Demonstration Program (YHDP) – YHDP is an initiative designed to reduce the number of youth experiencing homelessness. The goal of the YHDP is to support selected communities, including rural, suburban, and urban areas across the United States, in the development and implementation of a coordinated community approach to preventing and ending youth homelessness. This funding is distributed to community agencies through a competitive funding process and is used to operate youth-specific HMIS, CES, RRH and TH-RRH programs in the BoS.

ESG and CoC Coordination

The WV BoS CoC is committed to aligning and coordinating CoC governance, eligibility determinations, and prioritization for administering CoC and ESG Program funds. The WV BoS CoC works closely with the State ESG Grantee (the WVCAD Office) aligning efforts toward the goal of ultimately ending homelessness in West Virginia. Both parties cooperate to review performance of shelters, outreach projects, and permanent housing projects receiving ESG and CoC funding, and has created and plans to maintain an annual co-monitoring schedule across the CoC for all CoC and ESG-funded programs. The WV BoS CoC also works closely with the WVCAD Office to evaluate, develop, and promote a mutually agreed-upon outline and expectation set for all HUD funded programs as it relates to the established WV BoS CoC Coordinated Entry Process, as enumerated by regional and community input and communicated in this document. When applicable it is a primary goal among parties to also align monitoring and project performance

requirements for both ESG and CoC, within the parameters of the federal regulations for both funding streams, to enhance service delivery across the BoS CoC, regarding overall system performance standards, consistency, and compliance across programs.

HUD Program Monitoring for Victim Service Providers

Victim Service Providers are similarly bound by strong confidentiality rules and oversight must be conducted without demanding the disclosure of personally identifying information. Personally identifying victim information (PII) is confidential, and may not be disclosed in the course of reporting to funders, participating in program evaluation, or complying with routine audits. Grant administrators and auditors may be provided with non-personally identifying, aggregate data (totals) in order to comply with federal, state, tribal, or territorial reporting, evaluation, or data collection requirements. There is no federal statutory mandate requiring Violence Against Women Act (VAWA), Family Violence and Protection Services Act (FVPSA), and Victims of Crime Act (VOCA) grantees to disclose personally identifying information about people receiving services for the purposes of program monitoring and audits of grantee financial records and their use of federal funds. While there are regulations indicating that HUD program recipients and subrecipients should share all records with federal auditors and regulators, those regulations do not rise to the level of a statutory mandate as is required by VAWA, FVPSA, and VOCA before recipients and subrecipients of HUD program funds are allowed to lawfully disclose PII.

Appropriate oversight of programs can be achieved through disclosure of aggregate, non-personally identifying information about clients. VAWA, FVPSA, and VOCA regulations explicitly allow programs to disclose “nonpersonally identifying information, in the aggregate, regarding services to their clients and demographic nonpersonally identifying information in order to comply with federal, state, or tribal reporting, evaluation, or data collection requirements.” There are many ways in which a program can accurately report on its activities and participate in routine program monitoring and audits without violating confidentiality and non-disclosure requirements. In the circumstance of HUD programs, the Unique Personal Identification Number which is generated within the comparable database may be used to identify records of services to distinct individuals. The agency may provide a file or a portion of a file which has had all client identifying information effectively blacked out (as confirmed by a manager’s review of the document). Ideally, redaction should be done by the use of electronic redaction programs that remove all metadata and eliminate the risk of insufficient blacking out that can occur with manually using a black marker and a photocopy. Where there is a suspicion of actual fraud (separate from routine oversight activities), federal oversight authorities may seek a court mandate for disclosure of identifying information as they are able to show it is necessary to determine whether federal funds were misappropriated. Details on statutory references to help domestic violence programs and other Victim Service Providers navigate their responsibilities to protect victim confidentiality and participate in auditing and monitoring in connection with their HUD funds can be found [here](#).

NOTE: Where it states in the document that the CoC Monitor will review the HMIS records, this information will be obtained through aggregate reports in the Comparable Database or in the redacted client file, for all DV Bonus projects.

Monitoring Timeline

The CoC monitor will send out a list of tentative weeks for annual monitoring to all CoC and YHDP funded programs. This notice is sent out in advance of monitoring season to allow for scheduling accommodations. The CoC Monitor will typically conduct monitoring utilizing a hybrid model, including

both in-person and virtual desk monitoring. The CoC Monitor will select two CoC-funded agencies annually to visit on-site. The CoC monitor will send out an official monitoring notice 30 days prior to the on-site visit at each agency, with a detailed check list of the programmatic items, fiscal items, and a list of selected client files requested for review. Within this notice, there will be a date listed for when items are due to the monitor prior to monitoring. Providing requested items in advance will reduce the amount of time the monitor is on-site. Prior to the date of scheduled on-site monitoring, the monitor will also review previous Fiscal Year monitoring reports and quality improvement plans.

For desk monitoring, CoC Monitoring Team will schedule a virtual meeting with the CoC program point of contact at the beginning week scheduled for review to answer initial questions. The CoC Monitoring Team will typically conduct desk monitoring on Tuesday, Wednesday and Thursday of that week, and then schedule a virtual exit interview with program staff at the end of the designated week of monitoring or the following week, contingent on scheduling and number of projects. It is important for staff to be available by phone or email for questions throughout the week. The monitor will send the agency CoC project review scorecard(s) and monitoring summary within 30 days following monitoring. The monitor will also schedule a monitoring follow up call with the appropriate agency staff, upon request, to discuss the CoC project's score in detail.

On-site monitoring will be scheduled for 1-2 days according to the number and size of projects. The CoC monitor will conduct additional desk monitoring for the remainder of the week. On the day of on-site monitoring, the monitor will meet with the appropriate program supervisors and case management staff for an entry discussion and again for a debriefing discussion at the end. Fiscal staff should be available when monitor is on-site for related questions and client interviews will be conducted, with the appropriate consent. The CoC monitor will have 30 days following the date of on-site monitoring to submit the monitoring score card to all appropriate staff at the CoC-funded agency. The monitor will also schedule a monitoring follow up call with the appropriate agency staff, upon request, to discuss the CoC project's score in detail.

CoC Monitoring Scoring Criteria

Each CoC recipient and subrecipient will be evaluated on a 100-point scale by project type. If a question on the score card is not applicable to the CoC-funded project being evaluated, the total points amount of available points for that particular section will decrease. The final score will be a percentage of the project's total available points. Programs that receive lower scores (75% and below) will be required to complete a quality improvement plan and work with the CoC Team to improve grant management compliance and project performance. Agency administration and Board of Directors should be involved in this quality improvement process. Programs that illustrate high quality outcomes, compliance with best practices and procedures, and receive higher scores (76% and above) will not be required to complete a quality improvement plan. CoC recipients or sub-recipients which are funded under multiple project types, will have a separate score card for each project type.

- Overall Grant Management: 25 points
- Homeless Documentation/Recordkeeping Requirements: 25 points
- PSH, RRH, TH-RRH, SSO, HMIS, & CoC Planning Program Requirements: 25 points by project type
- CoC Financial Management, Cost Allowability, and Match Requirements: 25 points
- Final Score Summary Sheet: Percentage of total available points and details on recommendations for any lower scores per section.

Outline of Monitoring Activities

1. Overall Grant Management: This section is designed to assess the overall administration of the recipient's Continuum of Care (CoC) Program project(s).
 - The CoC Monitor will review the recipient's application(s), grant agreement(s), and any amendment(s) to the grant agreement(s) with HUD for the project(s) being monitored—including the attached CoC Program regulation at [24 CFR 578.23(c)]. It is important to keep in mind that when the monitor is reviewing a FY2024 project, for example, this means that the project was awarded during the 2024 CoC competition, operated during calendar year 2025, and ends in calendar year 2026.
 - When applicable, the monitor will also review any subrecipient agreement(s) and/or procurement contract(s) with the recipient to determine that the recipient monitored its subrecipients and reported the progress of the project(s) to the CoC and HUD [2 CFR 200.508(a); 2 CFR 200.509; 24 CFR 578.23(c)(2); 24 CFR 578.103(a)(17)].
 - The CoC Monitor will review and determine that the recipient established and maintained standard operating procedures that detail CoC program-specific and financial requirements to ensure that CoC Program funds were used in accordance with the provisions of the McKinney-Vento Act [24 CFR 578.103(a)]. Recipient policies and procedures should include the following [Chapter 29-3]:
 - Intake procedures demonstrating participation in the CoC's Coordinated Entry System (CES) and compliance with CoC guidance [[HUD Coordinated Entry Notice: CPD-17-01](#); [WV BoS CoC CES Written Guidance](#)]
 - Process for documenting eligibility and record keeping requirements [24 CFR 578.103(a)(3); 24 CFR 576.500(b)]
 - Housing Search process and Subsidy Standards/Bedroom Size policies and procedures [24 CFR 578.539(e)(8); 24 CFR 982.401]
 - Unit Inspection policies and procedures at Initial and Re-inspection: Housing Quality Standards [24 CFR 982.401]
 - Lead hazard disclosure, documentation, and abatement procedures, including the process for reporting to the local Health Department [24 CFR 578.99(f)]
 - Owner Rents, Rent Reasonableness, and Fair Market Rents [24 CFR 578.49(b)(2)]
 - Lease and sublease agreement requirements [24 CFR 578.77; 24 CFR 578.51(l); 24 CFR 578.3]
 - VAWA Protections [24 CFR Subpart L]
 - Equal opportunity statement- Fair Housing, Non-Discrimination and Reasonable Accommodations policies, including procedures for how the recipient implements its programs in a manner that affirmatively furthers fair housing [24 CFR 578.93].
 - Process of maintaining confidentiality of client records [24 CFR 578.103(b)]
 - Total Tenant Payment and Family Share [24 CFR 578.77]. PSH projects should utilize the Area Median Income calculation when working with households to determine rent contribution [Final rule for the Housing Opportunity Through Modernization Act of 2016 (HOTMA)].
 - Client-centered, low-barrier service provisions [24 CFR 578.3]
 - Case management roles and requirements [24 CFR 578.53; 24 CFR 578.37(a)(1)(ii)(F)]
 - Discharge planning to mainstream housing [24 CFR 578.1(b)(3); 24 CFR 578.3]
 - Termination and Complaint/Appeals policies and procedures [24 CFR 578.91]
 - Displacement and Relocation policies and procedures [24 CFR 578.83]
 - Record Retention policies and procedures [2 CFR 200.333; 24 CFR 578.103(c)]

- Environmental Review requirements [24 CFR 578.99(a)]
 - Drawing once per quarter requirements [24 CFR 578.85(c)(3)]
 - Process for documenting CoC Match [2 CFR 200.306; 24 CFR 578.73]
 - Process for collecting and expending Program Income, when applicable [2 CFR 200.302(b)(4); 24 CFR 578.97]
 - Drug-free workplace policies and procedures [24 CFR 578.99; 24 CFR 5.105(d); 2 CFR part 2429]
 - Lobbying restrictions [2 CFR 200.326; 24 CFR 578.99; 24 CFR 87.110; 24 CFR 5.105(b)]
 - Conflict of Interest Policy [2 CFR 200.318(c)(1)&(2); 24 CFR 578.95; 24 CFR 578.103(a)(11) (or 24 CFR 578.103(a)(12))]
 - Process for reporting significant program changes to HUD [24 CFR 578.105]
 - Transparency Act reporting [2 CFR Part 170; 24 CFR 578.99(c)]
 - Homeless Management Information System (HMIS) or comparable data base participation and reporting requirements [24 CFR 578.103(e); <https://www.hudexchange.info/programs/hmis/hmis-regulations-and-notices/>]
 - Performance and on-going assessment requirements [24 CFR 578.103(e) and, for grants awarded in the 2015 competition and later, 2 CFR 200.328(b)(2)(i)]. Agency policies should include how program participant feedback is gathered to inform project impact and identify areas for improvement.
 - Eligible CoC costs by project type [24 CFR 578 Subpart D]
 - If a RRH, TH-RRH, or PSH project was funded in or after FY22, the agency should have policies which detail the procedures for maintaining these partnerships with healthcare and non-CoC/ESG housing providers, in addition to, tracking in-kind healthcare services or transitions/exits to other permanent housing outlined in the Letter of Support which accompanied the project application.
2. Homeless Documentation/Recordkeeping Requirements: In this section, the CoC Monitor is responsible for determining whether sufficient supporting documentation is included in or is missing from the program participant relevant files to support conclusions, including any finding(s) and/or concern(s) noted in the final monitoring report [24 CFR 578.103(a); 24 CFR 576.500(b); 24 CFR 576.500(c)]. To monitor this area, the following will be requested:
- The monitor will extrapolate a listing of project program participants from the selected reporting period, including their entry dates, from the Homeless Management Information System (HMIS).
 - From the HMIS listing, the monitor will select a random sampling of client files to review, supplemented by recipient staff interviews.
 - CoC-funded Victim Services Providers may provide a list of Unique Personal Identification Numbers which are generated within the comparable database to be used to identify records of services to distinct individuals. The monitor will then select from this list, and the agency may provide a file or a portion of a file which has had all client identifying information effectively blacked out.
 - The monitor will review the recipient's client intake packet. It is important to note that there are program-specific requirements and those documents should also be included in the intake packet. Recipients can access a list of intake documents and resources on the WVCEH website under [CoC Monitoring Toolkit](#) for CoC-funded projects to utilize in their staff training, strategic planning, and goal setting while continuing to follow best practices and new developments within the field. Recipient intake packets should include the following [Chapter 29-1]:

- Verification and Documentation of Program Eligibility: The monitor will review the recipient's or subrecipient's procedures for obtaining documentation of homelessness for program participants. This documentation should be available in HMIS or available for review in the client file. The recipient or subrecipient should work with the Coordinated Entry System access points to obtain this documentation as quickly as possible. However, obtaining this documentation should not prevent a household from services.
 - Verification and Documentation of Homelessness (RRH, TH-RRH, PSH): The recipient's or subrecipient's written intake procedures should establish the order of priority for obtaining evidence of homelessness and/or at-risk of homelessness as: (1) third-party documentation; (2) intake worker observations; and (3) self-certification. If the recipient/subrecipient is using HMIS or a comparable database to document program participants' homeless status, the HMIS or comparable database should retain an auditable history of all entries, including identification of the person who entered the data, the date of entry, and the change made [24 CFR 578.103(a)(3); 24 CFR 576.500(b)].
 - Verification and Documentation of Length of Time Homeless (PSH): The recipient's or subrecipient's written intake procedures should establish the process for adequately documenting Homeless Status and Length of Time Homeless upon entry into the program through HMIS and third-party documentation of the months the client was experiencing homelessness that are not documented in HMIS. For Permanent Supportive Housing Dedicated beds, the program participant may self-certify up to three months [24 CFR 578.103].
 - Verification and Documentation of Disabling Condition (PSH): Where a disability is required for entry into a project (e.g., Permanent Supportive Housing), program participant files should exhibit acceptable evidence of the qualifying individual's disability. The requirements for documenting disability are: (1) written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long continuing or of indefinite duration and substantially impedes the individual's ability to live independently; (2) written verification from the Social Security Administration; (3) the receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation); (4) intake staff-recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence; or (4) other documentation approved by HUD. [24 CFR 578.37(a)(i); 24 CFR 578.103(a)]
- Documentation of Citizenship: The monitor will review the recipient's or subrecipient's procedures for obtaining documentation of identification for program participants (e.g. Birth Certificate, Social Security Card, Photo ID, State Benefits Cards, Jail Records, etc.). This documentation should be uploaded in HMIS or available for review in the client file. The recipient or subrecipient should work with the Coordinated Entry System entry points to obtain this documentation as quickly as possible. However, obtaining this documentation should not prevent a household from services. CoC RRH and TH-RRH programs have 30 days to obtain this documentation post-enrollment and CoC PSH programs have 45 days to obtain this documentation.

In the Personal Responsibility and Work Opportunity Act (PRWORA) of 1996, Congress restricted immigrant access to certain federal public benefits but also recognized exceptions to protect life or safety, based on a 3-part test. There are certain types of federal assistance that are not subject to the Act's restriction on access to public benefits

based on immigration status. This includes activities that: (1) deliver in-kind services at the community level, (2) are necessary for the protection of life or safety, and (3) do not condition the provision of assistance on the potential program participant's income or resources. The remainder of this document covers the types of assistance funded through the ESG and CoC Programs that are covered by this life or safety exception. HUD has determined that the following forms of assistance meet this three-part test and, therefore, are not subject to the Act's immigration-based restrictions:

- Street Outreach Services
- Emergency Shelter
- Safe Haven
- Rapid Re-Housing

Transitional housing meets the 3-part test and falls within the exception for life or safety, and therefore must be provided to persons without regard to immigration status, when the recipient or subrecipient owns or leases the building used to provide transitional housing. However, in transitional housing programs where the recipient or subrecipient provides rental assistance payments on behalf of program participants, this type of program does not fall within the life or safety exemption because the rental assistance provided is required by regulation to be based on the program participant's income and, therefore, does not meet the 3-part test. HUD reminds nonprofit organizations that are recipients of CoC or ESG Program funds that the Act does not require nonprofit charitable organizations to verify the immigration status of applicants for federal, state, or local public benefits.

- Coordination with the CoC Coordinated Entry System: The CoC Monitor will review evidence of participation in the established CoC Coordinated Entry System (CES); including but not limited to [[HUD Coordinated Entry Notice: CPD-17-01](#); [WV BoS CoC CES Written Guidance](#); [HUD Prioritization for PSH Notice: CPD-16-11](#)]:
 - The use of HMIS to coordinate with system access points to obtain documentation of client need, length of time homeless and services for the purposes of prioritization, eligibility determination, and permanent housing referrals;
 - On-going communication with the CES through evidence of referral acceptance rates, case notes, and timeliness in updating unit lists in HMIS, or via paper file for Victim Services Providers;
 - Reduction in the length of time from CES referral to PH project enrollment to move-in;
 - Participation in CoC planning meetings and CES provider regional calls.
- Verification of Income: The CoC Monitor will be reviewing client files to determine if the household is being connected with the appropriate resources to increase their income. The case manager should be documenting income changes in HMIS and in the client file (e.g. pay stubs, benefit award letters, etc.). Although the CoC Program interim rule does not establish an income eligibility guideline for continued assistance, CoC recipients and subrecipients must conduct regular re-evaluations, at least annually, of program participants receiving TH-RRH, RRH, and PSH assistance. To continue to receive RRH assistance, a program participant's re-evaluation must demonstrate eligibility based on [24 CFR 578.37(a)(1)(ii)(E); 24 CFR 578.103(a)(17); https://files.hudexchange.info/resources/documents/Rapid_Re-Housing_ESG_vs_CoC.pdf]:

- Lack of resources and support networks: The program participant’s household must continue to lack sufficient resources and support networks to retain housing without ESG or CoC program assistance.
 - Need: The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.
 - Agency and HMIS Releases of Information (ROI): The CoC Monitor will review both HMIS and the client file for updated Agency and HMIS ROIs, when applicable, signed by all adult household members.
- 3. PSH, RRH, TH-RRH, SSO, HMIS, and Planning Specific Program Requirements: The CoC Monitor will assess the recipient’s compliance with PSH, RRH, TH-RRH, SSO and HMIS project components of the Continuum of Care (CoC) Program.
 - PSH Specific Requirements:
 - The CoC Monitor will review client files to determine that the recipient and its subrecipients meet the requirement to provide permanent housing assistance without a designated length of stay [24 CFR 578.37(a)(1)(i); 24 CFR 578.103(a)(17)]. The record will also be reviewed to determine that program participants are connected to other mainstream housing upon exit.
 - The CoC Monitor will review the lease and sublease, when applicable, to determine that the program participants receiving permanent housing assistance have a signed lease agreement of at least 1 year that was renewable (for a minimum term of 1 month) and terminable only for cause [24 CFR 578.3; 24 CFR 578.103(a)(17)]. For site-based PSH projects, there should be a lease agreement in place between the program participant and recipient/subrecipient. For PSH Leasing projects, there should be a lease agreement in place between the landlord and recipient/subrecipient and a sublease agreement in place between the program participant and recipient/subrecipient.
 - The CoC Monitor will review the PSH lease and sublease to ensure that it includes the Violence Against Women’s Act (VAWA) Lease Addendum. HUD’s [VAWA Final Rule](#) implements the requirements of the 2013 reauthorization of the Violence Against Women Act for HUD covered housing programs, including CoC Programs. The rule was created to help ensure all individuals have access to a safe home without the fear of violence and to reduce the risk of homelessness among survivors. According to the [VAWA training on the HUD Exchange](#), rental agreements for CoC recipients and subrecipients must outline VAWA protections in all rental agreements/housing assistance contracts with private housing owners and managers. All CoC PSH programs should be using the lease addendum (Form HUD-91067) at lease and sublease signing.
 - The CoC Monitor will review client and leasing files to ensure that housing leased with CoC program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the National Standards for the Physical Inspection of Real Estate (NSPIRE). NSPIRE inspections should be completed at move-in and annually during recertification. The unit must also meet the criteria for suitable dwelling size and have at least one bedroom or living/sleeping room for every two persons [24 CFR 982.401; 24 CFR 578.75(b)(c)].
 - The CoC Monitor will review client and leasing files to ensure CoC recipients and subrecipients are following other federal requirements contained in the CoC interim rule under 24 CFR 578.99. These include compliance with federal requirements such

as the Coastal Barriers Resources Act, OMB Circulars, HUD's Lead-Based Paint regulations, and audit requirements. A lead-based paint visual assessment must be completed on the following housing units constructed before 1978: (1) Units housing families with children six (6) years of age or younger and/or (2) Units housing a pregnant person. Lead-based paint disclosures must be provided to client households in all housing units constructed prior to 1978. There should be documentation in the client file that the household was provided a lead-based disclosure form and copy of the "Protect Your Family from Lead in the Home" pamphlet. A lead-based paint visual inspection should be completed at move-in and annually during recertification [24 CFR 578.99(f)].

- The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable to all CoC-funded programs. The CoC Monitor will review client and leasing files for documentation in the client file that the household was provided information on Tenant Rights and Responsibilities and Fair Housing Laws [24 CFR 578.93].
- The CoC Monitor will review HMIS and client files to determine that program participants receive supportive services for the duration of their stay in a permanent supportive housing project [24 CFR 578.53(b)(2); 24 CFR 578.103(a)(17)].
- In PSH projects where a qualifying program participant died, was incarcerated, or institutionalized for more than 90 days, the CoC Monitor will review records to determine that surviving members of the household who were living in a CoC Program-assisted housing at the time of the qualifying member's death, long-term incarceration, or long-term institutionalization received rental assistance until the expiration of the current lease [24 CFR 578.75(i); 24 CFR 578.103(a)(17)].
- Financial documents and client files will be reviewed to determine that grant funds expended for leasing structures were used to provide supportive services to homeless persons, the staff and overhead costs directly related to leasing structures, or individual units to provide housing or supportive services to homeless persons [24 CFR 578.49(a); 24 CFR 578.59(a); 24 CFR 578.103(a)(17)].
- The CoC Monitor will verify that HUD authorized an exception for good cause for any grant funds expended for leasing structures or individual housing units owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership [24 CFR 578.49(a); 24 CFR 578.103(a)(17)].
- Leasing and client files will be reviewed to determine that the recipient or its subrecipients did not exceed HUD-determined fair market rents (FMR) with grant funds expended for leasing structures or units to provide housing or supportive services. It is important to note that recipients/subrecipients may use other funds (not CoC Program funds or tenant rents) to pay rents that are above FMR, so long as the rent is still reasonable [24 CFR 578.49(b)(2); 24 CFR 578.103(a)(17)]. Where utilities are not included in the lease and, therefore, not covered by leasing dollars, the recipient/subrecipient must consider the cost of utilities when calculating whether the amount paid is reasonable. If operating costs were expended on utilities for housing, records should confirm that the utilities were not included in the lease [24 CFR 578.55(c); 24 CFR 578.103(a)(17)]. Client files should include the rent reasonableness/FMR form, in addition to information and pictures of comparable units.

- Leasing and client files will be reviewed to determine that grant funds expended for leasing structures or units do not exceed 2 months of actual rent for a security deposit or first/last months' rent [24 CFR 578.49(b)(4); 24 CFR 578.103(a)(17)].
- Leasing and client files will be reviewed to determine that the recipient/subrecipient properly calculates monthly rent amounts collected from each program participant [24 CFR 578.49(b)(6); 24 CFR 578.103(a)(17); 24 CFR 578.77(b)].
- When supportive services are provided in a facility not contained in a housing structure, the CoC Monitor will review that funds are expended only for supportive services delivery and costs classified as day-to-day operation of the supportive services facility, including maintenance, repair, building security, furniture, utilities and equipment as supportive services costs [24 CFR 578.53(a); 24 CFR 578.59(a); 24 CFR 578.103(a)(9)].
- The CoC Monitor will review HMIS and client files to verify that supportive services paid with grant funds are necessary to assist program participants to obtain and maintain housing [24 CFR 578.53(a)(1); 24 CFR 578.103(a)(9)].
- The CoC Monitor will review HMIS and client files to determine that the recipient or its subrecipients are conducting an annual assessment of the service needs of all program participants and adjusting services as necessary [24 CFR 578.53(a)(2); 24 CFR 578.103(a)(7)(i)].
- The project description in the approved grant application shows that the recipient/subrecipient will provide a particular type of supportive service listed in 24 CFR 578.53. The CoC Monitor will review the grant application, issues and conditions, and financial documents to determine the grant funds were expended on supportive services costs indicated in the grant application, including the staff and overhead costs directly related to carrying out the costs (*see Supportive Services section below*).
- The CoC Monitor will review financial documents to determine that Operation grant funds were expended only for the costs of the day-to-day operation of permanent housing in a single unit or structure, including the staff and overhead costs directly related to carrying out the day-to-day operation of permanent housing, including maintenance and repair of housing, property taxes and insurance, scheduled payments to a replacement reserve, building security, utilities (electricity, gas, and water), furniture, and equipment [24 CFR 578.55(a); 24 CFR 578.59(a); 24 CFR 578.103(a)(17)].
- If grant funds were expended on building security the CoC Monitor will review financial documents to verify that payments for a structure where more than 50% of the units or area was paid for with grant funds [24 CFR 578.55(a)(4); 24 CFR 578.103(a)(17)].
- The CoC Monitor will review financial documents to determine that no grant funds were used for the operating costs of an emergency shelter or supportive services-only facilities [24 CFR 578.55(c); 24 CFR 578.103(a)(17)].
- If operating costs were expended on the maintenance and repair of housing the CoC Monitor will review the lease to confirm that the costs of maintaining and repairing the housing are not included in the lease [24 CFR 578.55(c); 24 CFR 578.103(a)(17)].
- If operating costs were expended on utilities for housing the CoC Monitor will review the lease to confirm that the utilities were not included (if a lease has been executed) [24 CFR 578.55(c); 24 CFR 578.103(a)(17)].
- RRH Specific Requirements:

- The CoC Monitor will review the lease to determine that the program participants receiving permanent housing assistance have a signed lease agreement of at least 1 year that was renewable (for a minimum term of 1 month) and terminable only for cause [24 CFR 578.3; 24 CFR 578.103(a)(17)]. When grant funds were expended for rental assistance lease agreements should be in place between the program participant and the landlord/landowner. There should also be an agreement between the recipient/subrecipient and the landlord outlining deposit, utility, and rent payment responsibilities by month. [24 CFR 578.51; 42 U.S.C. 11304; 24 CFR 578.103(a)(17)]
- The CoC Monitor will review the RRH lease to ensure that it includes the Violence Against Women’s Act (VAWA) Lease Addendum. HUD’s [VAWA Final Rule](#) implements the requirements of the 2013 reauthorization of the Violence Against Women Act for HUD covered housing programs, including CoC Programs. The rule was created to help ensure all individuals have access to a safe home without the fear of violence and to reduce the risk of homelessness among survivors. According to the [VAWA training on the HUD Exchange](#), rental agreements for CoC recipients and subrecipients must outline VAWA protections in all rental agreements/housing assistance contracts with private housing owners and managers. All CoC RRH programs should be using the lease addendum (Form HUD-91067) at lease signing.
- The CoC Monitor will review client and leasing files to ensure that housing leased with CoC program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the National Standards for the Physical Inspection of Real Estate (NSPIRE). NSPIRE inspections should be completed at move-in and annually during recertification. The unit must also meet the criteria for suitable dwelling size and have at least one bedroom or living/sleeping room for every two persons [24 CFR 982.401; 24 CFR 578.75(b)(c)].
- The CoC Monitor will review client and leasing files to ensure CoC recipients and subrecipients are following other federal requirements contained in the CoC interim rule under 24 CFR 578.99. These include compliance with such federal requirements as the Coastal Barriers Resources Act, OMB Circulars, HUD’s Lead-Based Paint regulations, and audit requirements. A lead-based paint visual assessment must be completed on the following housing units constructed before 1978: (1) Units housing families with children six (6) years of age or younger and/or (2) Units housing a pregnant person. Lead-based paint disclosures must be provided to client households in all housing units constructed prior to 1978. There should be documentation in the client file that the household was provided a lead-based disclosure form and copy of the “Protect Your Family from Lead in the Home” pamphlet. A lead-based paint visual inspection should be completed at move-in and annually during recertification [24 CFR 578.99(f)].
- The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable to all CoC-funded programs. The CoC Monitor will review client and leasing files for documentation in the client file that the household was provided information on Tenant Rights and Responsibilities and Fair Housing Laws [24 CFR 578.93].
- Since the WV BoS CoC has established a system for prioritizing persons for RRH, the CoC Monitor will review HMIS and client files to determine that the recipient and its subrecipients are complying with the CoC CES written guidance for determining and prioritizing youth, families and individuals for RRH assistance. The monitor will also

review leasing and client files to verify that recipient and its subrecipients are complying with the CoC RRH written guidance regarding the amount (or percentage) of rent that each program participant must pay [24 CFR 578.37(a)(1)(ii)(A); 24 CFR 578.103(a)(17)].

- The CoC Monitor will review financial documents to determine that the recipient and its subrecipients meet the requirement to expend grant funds for only supportive services, tenant-based rental assistance, administration, or relocation (only if the grant agreement provided funds for those costs) [24 CFR 578.37(a)(1)(ii)].
- The CoC Monitor will review financial and client files to determine that the recipient and its subrecipients meet the requirement to provide tenant-based rental assistance that did not exceed 24 months per household and that program participants received supportive services for no more than 6 months after rental assistance ended [24 CFR 578.37(a)(1)(ii)(C)&(D); 24 CFR 578.103(a)(17)].
- The CoC Monitor will review HMIS and client files to determine that the project requires participants to meet with a case manager at least once per month to assist the participant in ensuring long-term housing stability. The CoC Monitor should be aware when a project is exempt from this requirement due to the Violence Against Women Reauthorization Act of 2013 or the Family Violence Prevention and Services Act, which prohibits a recipient/ subrecipient from making housing conditional on the program participant's acceptance of services [24 CFR 578.37(a)(1)(ii)(F); 24 CFR 578.103(a)(17)].
- The CoC Monitor will review financial documents to verify that grant funds were not expended for rental assistance provided to a program participant who was already receiving rental assistance, living in a housing unit receiving rental assistance, or operating assistance through other federal, state, or local sources [24 CFR 578.51(a); 24 CFR 578.103(a)(17)].
- The CoC Monitor will review financial documents to verify that grant funds were expended for rental assistance only for some or all of the following eligible costs, or the staff and overhead costs directly related to carrying out these eligible costs: rental assistance, administering rental assistance, security deposits, first/last months' rent, and vacancy payments [24 CFR 578.51(a)(2); 24 CFR 578.51(b); 24 CFR 578.51(h)(4)(i); 24 CFR 578.51(j); 24 CFR 578.103(a)(17)].
- HMIS and client files will be reviewed to determine that program participants were allowed to choose housing of an appropriate size in which to reside [24 CFR 578.51(c); 24 CFR 578.103(a)(17)].
- If program participants were required to live in a specific area for their entire period of participation or in a specific structure for the first year and in a specific area for the remainder of their period of participation, the CoC Monitor will review documents to establish that the restriction to a structure or area is necessary [24 CFR 578.51(c); 24 CFR 578.103(a)(17)].
- If a household assisted with tenant-based rental assistance moves outside of the geographic area for the household's health and safety based on the household's reasonable belief that they were imminently threatened for further domestic violence, dating violence, sexual assault, or stalking, the CoC Monitor will review redacted client files to determine that the household complied with all program requirements during their residency and were at imminent risk of further harm [24 CFR 578.51(c)(3); 24 CFR 578.103(a)(5)].

- The CoC Monitor will review financial and client files to determine the recipient or its subrecipients are verifying whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units. Client files should include the rent reasonableness/FMR form, in addition to information and pictures of comparable units [24 CFR 578.51(g); 24 CFR 578.103(a)(17)].
- If an assisted unit was vacated before the expiration of the lease, the CoC Monitor will review leasing and financial records to determine that the recipient/subrecipient paid rental assistance for vacancies for no more than 30 days from the end of the month in which the unit was vacated. Brief periods of stays in institutions (not to exceed 90 days) by program participants are not considered “vacancies” and the recipient/subrecipient may continue to pay rent on the unit while the program participant is in the institution [24 CFR 578.51(i); 24 CFR 578.103(a)(17)].
- The CoC Monitor will review HMIS and client files to verify that supportive services paid with grant funds are necessary to assist program participants to obtain and maintain housing [24 CFR 578.53(a)(1); 24 CFR 578.103(a)(9)].
- The project description in the approved grant application shows that the recipient/subrecipient will provide a particular type of supportive service listed in 24 CFR 578.53. The CoC Monitor will review the grant application, issues and conditions, and financial documents to determine the grant funds were expended on supportive services costs indicated in the grant application, including the staff and overhead costs directly related to carrying out the costs (*see Supportive Services section below*).
- TH-RRH Specific Requirements: Below are requirements for the TH component of the TH-RRH project. All requirements for the RRH component are listed in the previous section.
 - The CoC Monitor will review HMIS and client files to determine that the recipient and its subrecipients meet the requirement to provide TH-RRH assistance for no longer than a total of 24 months per program participant. and that program participants received supportive services for no more than 6 months after assistance ended [24 CFR 578.37(a)(2); 24 CFR 578.53(a)(3); 24 CFR 578.79; 24 CFR 578.103(a)(17)].
 - The CoC Monitor will review leasing files to verify that program participants receiving TH assistance signed a lease, sublease, or occupancy agreement of at least 1 month that was renewable for up to 24 months, or until the household is connected to RRH [24 CFR 578.3; 24 CFR 578.103].
 - The CoC Monitor will review the TH lease to ensure that it includes the Violence Against Women’s Act (VAWA) Lease Addendum. HUD’s [VAWA Final Rule](#) implements the requirements of the 2013 reauthorization of the Violence Against Women Act for HUD covered housing programs, including CoC Programs. The rule was created to help ensure all individuals have access to a safe home without the fear of violence and to reduce the risk of homelessness among survivors. According to the [VAWA training on the HUD Exchange](#), rental agreements for CoC recipients and subrecipients must outline VAWA protections in all rental agreements/housing assistance contracts with private housing owners and managers. All CoC TH program components should be using the lease addendum (Form HUD-91067) at lease signing.
 - The CoC Monitor will review client and leasing files to ensure that housing leased with CoC program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the National Standards for the Physical Inspection of Real Estate (NSPIRE). NSPIRE inspections should be completed at move-

- in and annually during recertification. The unit must also meet the criteria for suitable dwelling size and have at least one bedroom or living/sleeping room for every two persons [24 CFR 982.401; 24 CFR 578.75(b)(c)].
- The CoC Monitor will review client and leasing files to ensure CoC recipients and subrecipients are following other federal requirements contained in the CoC interim rule under 24 CFR 578.99. These include compliance with such federal requirements as the Coastal Barriers Resources Act, OMB Circulars, HUD’s Lead-Based Paint regulations, and audit requirements. A lead-based paint visual assessment must be completed on the following housing units constructed before 1978: (1) Units housing families with children six (6) years of age or younger and/or (2) Units housing a pregnant person. Lead-based paint disclosures must be provided to client households in all housing units constructed prior to 1978. There should be documentation in the client file that the household was provided a lead-based disclosure form and copy of the “Protect Your Family from Lead in the Home” pamphlet. A lead-based paint visual inspection should be completed at move-in and annually during recertification [24 CFR 578.99(f)].
 - The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable to all CoC-funded programs. The CoC Monitor will review client and leasing files for documentation in the client file that the household was provided information on Tenant Rights and Responsibilities and Fair Housing Laws [24 CFR 578.93].
 - The CoC Monitor will review financial documents to determine that Operation grant funds were expended only for the costs of the day-to-day operation of permanent housing in a single unit or structure, including the staff and overhead costs directly related to carrying out the day-to-day operation of permanent housing, including maintenance and repair of housing, property taxes and insurance, scheduled payments to a replacement reserve, building security, utilities (electricity, gas, and water), furniture, and equipment [24 CFR 578.55(a); 24 CFR 578.59(a); 24 CFR 578.103(a)(17)].
 - If grant funds were expended on building security, the CoC Monitor will review financial documents to verify that payments for a structure where more than 50% of the units or area was paid for with grant funds [24 CFR 578.55(a)(4); 24 CFR 578.103(a)(17)].
 - The CoC Monitor will review financial documents to determine that no grant funds were used for the operating costs of an emergency shelter or supportive services-only facilities [24 CFR 578.55(c); 24 CFR 578.103(a)(17)].
 - If operating costs were expended on the maintenance and repair of housing, the CoC Monitor will review the lease to confirm that the costs of maintaining and repairing the housing are not included in the lease [24 CFR 578.55(c); 24 CFR 578.103(a)(17)].
 - Supportive Services Only (SSO) Specific Requirements (Coordinated Entry System- CES): The CoC Monitor will use HMIS reports to review the CES project’s overall system-wide impact. The CES staff utilize HMIS to oversee the housing guide, prioritize in accordance with the CoC guidance, and make live referrals to the appropriate housing resource in each WV BoS CoC region. The SSO (CES) recipient is responsible for evaluating and making modifications when needed to improve the Coordinated Entry System across all programs. In partnership with the CoC, the SSO (CES) recipient is also responsible for providing technical assistance to communities to ensure universal entry requirements for the homeless services response system and educating community stakeholders, providers, and consumers on their role during

the assessment, prioritization, and referral phases of the CES [[HUD Coordinated Entry Notice: CPD-17-01](#); [Coordinated Entry Core Elements](#); [WV BoS CoC CES Written Guidance](#); [HUD Prioritization for PSH Notice: CPD-16-11](#)]. The CoC Monitor will review HMIS reports, policies and procedures, and client records to assess CES system-wide impact on the following components:

- Utilize HMIS reporting to assess CoC-wide diversion efforts and first-time homeless numbers.
- Utilize HMIS reporting to determine the total number of clients served by CES for a specific time period.
- Utilize HMIS reporting to determine the number of clients served who exited to a temporary location or went from street to ES.
- Utilize HMIS reporting to determine the number of clients served who exited to a permanent housing destination.
- Utilize HMIS reporting to determine the total number of referrals made to SO, ES, RRH, PSH, HOPWA, or other PH.
- Utilize HMIS reporting to determine the number of referrals enrolled in a PH program.
- Utilize HMIS reporting to assess the timeframe from CES referral to project enrollment to move-in.
- Review policies and procedures to ensure there is an established comprehensive CoC-wide advertising strategy.
- Review policies and procedures and client records in HMIS to ensure that a common assessment tool is being utilized for entry into the CES.
- Review policies and procedures and client records in HMIS to determine that CES is following the CoC-established prioritization process and Order of Priority for both RRH and PSH.
- Review policies and procedures to ensure that the CES adheres to all jurisdictionally relevant civil rights and fair housing laws and regulations. The CES recipient must have procedures in place to ensure that all persons seeking services in the WV BoS CoC's geographic area, shall have access to the CES.
- Review policies and procedures to ensure that participants are informed of the ability to file a complaint or grievance and each participating provider must provide details of who the point of contact is for addressing such complaints.
- Review policies and procedures and client records in HMIS to ensure that the CES has an established barrier-free, rapid process for housing referrals, filling unit vacancies, and assigning units with client choice.
- Supportive Services Only (SSO) Specific Requirements (non-CES): This is an eligible project type allowed in the FY19/20 YHDP NOFO to provide supportive services, such as conducting outreach to youth (under 25 years old) experiencing sheltered and unsheltered homelessness and providing referrals to housing or other necessary services. Activities may also include, but are not limited to, housing search and placement services, case management, drop-in centers, legal services, street outreach, or employment support [24 CFR 578.37(a)(3), YHDP FY19/20 NOFO Appendix A]. The CoC Monitor will evaluate the following areas of performance for YHDP SSO non-CES projects to ensure compliance with program regulations and eligible costs outlined in Subpart D of the CoC Interim Rule (24 CFR 578):
 - HMIS reporting/client file demonstrate that the recipient has improved diversion efforts and reduced first-time homeless numbers among youth in their service area.
 - HMIS reporting/client file demonstrate that the recipient is quickly connecting youth households to a safe, temporary location when living on the street.

- HMIS reporting/client file demonstrate that the recipient is tailoring services to the needs of each household and removing barriers to quickly connect households to a permanent housing destination.
- HMIS reporting/client file demonstrate that the recipient is reducing the length of time for persons experiencing homelessness in their service area.
- HMIS reporting/client file demonstrate that the recipient is connecting program participants to healthcare and behavioral health resources.
- HMIS reporting/client file demonstrate that the recipient is connecting program participants to employment and education resources.
- HMIS reporting/client file demonstrate that the recipient is connecting participants to mainstream benefits and disability benefits, when applicable.
- Grant funds were not expended on any unallowable costs and only utilized for Supportive Services and Administrative Costs outlined in the CoC Interim Rule (24 CFR 578) and approved in the most recent project application.
- HMIS Specific Requirements: The CoC Monitor will assess the recipient's compliance with the Homeless Management Information Systems (HMIS) program component in the Continuum of Care (CoC) Program. It is divided into three sections: Lead Costs, Recipient/Subrecipient Costs, and Project Administration.
 - The CoC Monitor will review financial records and policies of the HMIS Lead, who is designated by the CoC, to ensure that expend grant funds were utilized to pay the following costs, as well as the staff and overhead costs directly related to carrying out these costs:
 - Hosting and maintaining HMIS software or data [24 CFR 578.57(a)(2)(i); 24 CFR 578.103(a)(17)].
 - Backing up, recovering, or repairing HMIS software or data [24 CFR 578.57(a)(2)(ii); 24 CFR 578.103(a)(17)].
 - Upgrading, customizing, and enhancing the HMIS [24 CFR 578.57(a)(2)(iii); 24 CFR 578.103(a)(17)].
 - Integrating and warehousing data, including the development of a data warehouse for use in aggregating data from subrecipients using multiple software systems [24 CFR 578.57(a)(2)(iv); 24 CFR 578.103(a)(17)].
 - Administering the system [24 CFR 578.57(a)(2)(v); 24 CFR 578.103(a)(17)].
 - Reporting to providers, the Continuum of Care, and HUD [24 CFR 578.57(a)(2)(vi); 24 CFR 578.103(a)(17)].
 - Conducting training on using the system, including traveling to the training [24 CFR 578.57(a)(2)(vii); 24 CFR 578.103(a)(17)].
 - The CoC Monitor will review financial records and policies of the recipient/subrecipients to ensure that grant funds expended only pay for the costs of contributing data to the HMIS designated by the CoC, as well as the staff and overhead costs, directly related to the following activities:
 - Purchasing or leasing computer hardware [24 CFR 578.57(a)(1)(i); 24 CFR 578.103(a)(17)].
 - Purchasing software or software licenses [24 CFR 578.57(a)(1)(ii); 24 CFR 578.103(a)(17)].
 - Purchasing or leasing equipment, including telephones, fax machines, and furniture [24 CFR 578.57(a)(1)(iii); 24 CFR 578.103(a)(17)].
 - Obtaining technical support [24 CFR 578.57(a)(1)(iv); 24 CFR 578.103(a)(17)].
 - Leasing office space [24 CFR 578.57(a)(1)(v); 24 CFR 578.103(a)(17)].

- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS [24 CFR 578.57(a)(1)(vi); 24 CFR 578.103(a)(17)].
 - Paying salaries for operating HMIS [24 CFR 578.57(a)(1)(vii); 24 CFR 578.103(a)(17)].
 - Completing data entry [24 CFR 578.57(a)(1)(vii)(A); 24 CFR 578.103(a)(17)]
 - Monitoring and reviewing data quality [24 CFR 578.57(a)(1)(vii)(B); 24 CFR 578.103(a)(17)].
 - Completing data analysis [24 CFR 578.57(a)(1)(vii)(C); 24 CFR 578.103(a)(17)]
 - Reporting to the HMIS Lead [24 CFR 578.57(a)(1)(vii)(D); 24 CFR 578.103(a)(17)].
 - Training staff on using the HMIS [24 CFR 578.57(a)(1)(vii)(E); 24 CFR 578.103(a)(17)].
 - Implementing and complying with HMIS requirements [24 CFR 578.57(a)(1)(vii)(F); 24 CFR 578.103(a)(17)].
 - Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act [24 CFR 578.57(a)(1)(viii); 24 CFR 578.103(a)(17)].
 - Paying staff travel costs to conduct intake [24 CFR 578.57(a)(1)(ix); 24 CFR 578.103(a)(17)].
 - Paying participation fees charged by the HMIS Lead, as authorized by HUD, if the recipient or subrecipient is not the HMIS Lead [24 CFR 578.57(a)(1)(x); 24 CFR 578.103(a)(17)].
 - The CoC Monitor will review financial records and policies of the recipient/subrecipients to confirm that the comparable database complies with HUD's HMIS requirements if the recipient or its subrecipients are victim services providers or legal services providers, and if they used grant funds to establish and operate a comparable database [24 CFR 578.57(a)(3); 24 CFR 578.103(b)].
 - The CoC Monitor will review financial records and policies of the recipient/subrecipients to confirm that the recipient met the requirement to expend grant funds for HMIS costs in compliance with HMIS requirements published by HUD [24 CFR 578.57(b); 24 CFR 578.103(a)(17)].
- CoC Planning Specific Program Requirements: Collaborative applicants may use up to 3 percent of their Final Pro Rata Need (FPRN), or a maximum amount to be established by the NOFA [24 CFR 578.39], for costs of:
 - Designing and carrying out a collaborative process for the development of an application to HUD;
 - Evaluating the outcomes of projects for which funds are awarded in the geographic area under the CoC and ESG programs; and
 - Participating in the consolidated plan(s) for the geographic area(s).
 - The CoC Monitor will review CoC policies and procedures and financial records to ensure the CoC Planning Costs are utilized for the following:
 - Developing a communitywide or regionwide process to promote a commitment to end homelessness, provide funding to quickly re-house homeless people while minimizing trauma and dislocation, and optimize self-sufficiency among people experiencing homelessness.

- Establishing a CoC Steering Committee to serve as the governing body that oversees the implementation of the CoC Interim Rule [24 CFR 578] in the CoC’s designated geographic area and advise CoC Staff on policy changes relative to the CoC operation and function. Committee members must be representative of the following sectors: Non-profit homeless services sector, Law Enforcement, Victim Services Provider, Faith-Based Organization, Local Government, Business Owner, school district, Social Services or substance use disorder services, Mental Health provider, hospitals, University or other Post-Secondary Education, Affordable Housing Developer, Organizations serving Veterans, and a homeless or formerly homeless person.
 - Establishing various subcommittees to conduct the day-to-day business of the CoC. Subcommittees make recommendations to CoC Steering Committee on emergent issues related to Frontline trends, Evidence-based practice and Client advocacy, HMIS and reporting, Sub-population needs, Staff Development and Training, and Coordinated Entry.
 - Determining the geographic area that the CoC will serve.
 - Developing a CoC system.
 - Evaluating the outcomes of projects for which funds are awarded in the geographic area, including the ESG program.
 - Participating in the consolidated plan(s) of the jurisdiction(s) in the geographic area.
 - Preparing and submitting an application to HUD on behalf of the entire CoC membership, including conducting a sheltered and unsheltered point-in-time count and other data collection as required by HUD.
 - The costs of monitoring recipients and subrecipients and enforcing compliance with program requirements.
- Supportive Services, Case management, and Service Coordination: The CoC Monitor will review client HMIS and paper files to ensure that case management services are being provided by trained staff to each program participant. There should be a record in the client file that individual case management is being provided to program participants at a minimum of once a month [24 CFR 578.37(a)(1)(ii)(F)]. Case management should always be tailored to each household’s needs, and the CoC Monitor will review the client record to ensure that case management is being provided regularly to assist the program participant in maintaining long-term housing stability.
 - The CoC Monitor will review client and financial files to determine that supportive services paid for with grant funds were necessary to assist program participants to obtain and maintain housing [24 CFR 578.53(a)(1); 24 CFR 578.103(a)(9)]. If the project description in the approved grant application shows that the recipient would provide a particular type(s) of supportive service (listed below) the CoC Monitor will review records to ensure that grant funds expended for the costs of the supportive service(s) were limited to the listed costs— including the staff and overhead costs directly related to carrying out the costs of:
 - One-time moving costs: Truck rental and hiring a moving company are eligible costs [24 CFR 578.53(e)(2); 24 CFR 578.103(a)(9)]
 - Case management [24 CFR 578.53(e)(3); 24 CFR 578.103(a)(9)]
 - Child care [24 CFR 578.53(e)(4); 24 CFR 578.103(a)(9)]
 - Education services [24 CFR 578.53(e)(5); 24 CFR 578.103(a)(9)]

- Employment assistance and job training [24 CFR 578.53(e)(6); 24 CFR 578.103(a)(9)]
- Food [24 CFR 578.53(e)(7); 24 CFR 578.103(a)(9)]
- Housing search and counseling services. Landlord engagement and mediation are eligible costs [24 CFR 578.53(e)(8); 24 CFR 578.103(a)(9)]
- Legal services [24 CFR 578.53(e)(9); 24 CFR 578.103(a)(9)]
- Life skills training [24 CFR 578.53(e)(10); 24 CFR 578.103(a)(9)]
- Mental health services provided by licensed professionals [24 CFR 578.53(e)(11); 24 CFR 578.103(a)(9)]
- Outpatient health services provided by licensed medical professionals [24 CFR 578.53(e)(12); 24 CFR 578.103(a)(9)]
- Outreach services [24 CFR 578.53(e)(13); 24 CFR 578.103(a)(9)]
- Substance abuse treatment: Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible [24 CFR 578.53(e)(14); 24 CFR 578.103(a)(9)]
- Transportation: (1) Costs of program participants' travel on public transportation or in a vehicle provided by the recipient or its subrecipients to/from medical care, employment, child care, or other eligible supportive services [24 CFR 578.53(e)(15)(i); 24 CFR 578.103(a)(9)]; (2) Costs of mileage allowance for service workers to visit program participants [24 CFR 578.53(e)(15)(ii); 24 CFR 578.103(a)(9)]; (3) Costs of purchasing or leasing a vehicle in which staff transport program participants and/or staff serving program participants [24 CFR 578.53(e)(15)(iii); 24 CFR 578.103(a)(9)]; (4) Costs of gas, insurance, taxes, and maintenance for a vehicle transporting staff serving program participants and/or staff serving program participants [24 CFR 578.53(e)(15)(iv); 24 CFR 578.103(a)(9)]; (5) Costs of recipient and subrecipient staff to accompany or assist program participants to utilize public transportation [24 CFR 578.53(e)(15)(v); 24 CFR 578.103(a)(9)]
- Participant's vehicle repairs: (1) A one-time payment for car repairs or maintenance where public transportation did not exist or was insufficient [24 CFR 578.53(e)(15)(vi); 24 CFR 578.103(a)(9)]; (2) Costs did not exceed 10 percent of the Blue Book value of the vehicle [24 CFR 578.53(e)(15)(vi)(A); 24 CFR 578.103(a)(9)]; (3) Costs were paid by the recipient and its subrecipients directly to the third party that repairs or maintains the car [24 CFR 578.53(e)(15)(vi)(B); 24 CFR 578.103(a)(9)]; (4) If recipient and its subrecipients required program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance, did the records document the program participant's contribution [24 CFR 578.53(e)(15)(vi)(C); 24 CFR 578.103(a)(9)]
- Utility deposits: A one-time fee paid directly to the utility companies [24 CFR 578.53(e)(16); 24 CFR 578.103(a)(9)]
- If supportive services were provided in a facility not contained in a housing structure the CoC Monitor will review financial records to ensure that funds were expended only on costs classified as day-to-day operation of the supportive service facility including maintenance, repair, building security, furniture, utilities, and equipment as supportive services costs [24 CFR 578.53(a); 24 CFR 578.103(a)(9)].
- Annual Assessments/Recertifications: The CoC Monitor will review client paper and HMIS files to ensure that the recipient and its subrecipients meet the requirement for

- conducting an annual assessment of the service needs of all program participants that remain in the program for more than a year and adjust services as necessary. [24 CFR 578.53(a)(2); 24 CFR 578.103(a)(7)(i)]. Annual assessments should be recorded in HMIS within 30 days before or after (60-day window) on the anniversary of the project start date.
- Follow Up Services Post Project Exit: Recipient and its subrecipients provide supportive services for no longer than 6 months after rental assistance stops [24 CFR 578.37(a)(1)(ii)(D)]. Follow up services and assessments should be recorded in HMIS.
 - Case Management Tools:
 - Mutual Expectations and Agreement: The CoC Monitor will review client HMIS and paper files to determine that there is an agreement between the recipient/subrecipient and the program participant outlining mutual expectations for both parties throughout the time the program participant is enrolled in the housing assistance program.
 - Service Prioritization Decision Assistance Tool: The goal of housing stabilization is not only to identify needs of clients, but to work with the client to problem solve and move toward sustainability in housing (e.g. assist the client in the process of increasing income, teach the client how to their pay own bills and work on developing an honest budget, and assist the household in managing their own tenancy, etc.). CoC Monitor will review client HMIS and paper files to determine that CoC recipients and subrecipients are completing the full SPDAT at recommended time-intervals. The full SPDAT allows the case manager to see when intensive case management should be provided/offered to certain clients, and less supports needs provided to others, allowing the case manager to prioritize their caseload. Assessing at the correct time-intervals will also assist in the development of a long-term plan with the client to move into mainstream housing [24 CFR 578.53(e)(3)(v)].
 - Updated and Complete Case Notes: The CoC Monitor will review client case notes in the HMIS or paper file to ensure they are being completed monthly at a minimum. Case notes should illustrate the client's situation, barriers, and needs [24 CFR 578.53(e)(3)].
 - Housing Stabilization Plan: The CoC Monitor will review client records to ensure that a service plan/housing stabilization plan is included in the file. There should be evidence in the client record that goals are being set and that the case manager is working with the client to regularly assess and attain the goals [24 CFR 578.53(e)(3)(viii)]. Samples of housing stabilization plans and other case management tools can be found on the WVCEH website under the [WV BoS CoC Monitoring Toolkit](#).
 - Connection to Mainstream Resources: The CoC Monitor will review client records to determine that CoC recipients and subrecipients are increasing access to and effective utilization of health care, behavioral health, and mainstream programs to promote housing stability [24 CFR 578.1(b)(3); 24 CFR 578.53(e)(3)(vi)]. Details on mainstream resources can be found on the WVCEH website under the [WV BoS CoC RRH written guidance](#), [WV BoS CoC PSH written guidance](#), and [WV BoS CoC Monitoring Toolkit](#).
 - Monthly Budgeting and Increasing Income: The CoC Monitor will review client records to determine that CoC recipients and subrecipients are assisting program participants with budgeting each month and developing a plan to determine the program participant's rental contribution. There should be evidence in the client file that indicates the case manager is working with the client to increase their income [24 CFR 578.53(e)(5) and (6) and (10)]. When a client has a disability that meets the criteria

under the Social Security Administration and does not currently have disability benefits, the CoC Monitor will review the record to determine if project staff are assisting the household with submitting an SSI/SSDI application.

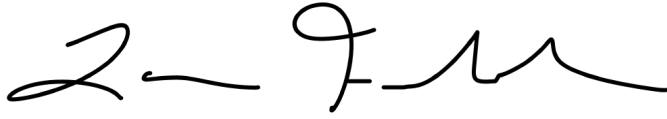
- Annual Performance Report (APR): All grants submitted for renewal must also submit an APR within 90 days of the end of the program year. In addition to the reporting requirements in 24 CFR parts 84 and 85, the recipient must collect and report data on its use of CoC funds in an APR, as well as in any additional reports as and when required by HUD. Projects receiving grant funds only for acquisition, rehabilitation, or new construction must submit APRs for 15 years from the date of initial occupancy or the date of initial service provision, unless HUD provides an exception under 24 CFR 578.81(e). The recipient's submission of the APR helps HUD review whether the recipient is carrying out the project in the manner proposed in the application [24 CFR 578.33(f); 24 CFR 578.103(e)]. The CoC Monitor will review the most recently submitted APR during monitoring. For more information on submitting APRs in Sage HMIS Reporting Repository, visit <https://www.hudexchange.info/programs/e-snaps/guides/apr/#guides-and-tools>.
 - Project and CoC Performance: The CoC Monitor will review individual project performance, and its impact on overall CoC-wide system performance.
 - Project Performance Data:
 - Number of Positive Exit Destinations
 - Average Unit Utilization
 - Length of Time between Project Start Date and Housing Move-in Date
 - Increase in Income for Project Stayers and Leavers
 - Number of Participants enrolled in PSH for over 5 years
 - System Performance Measures:
 - Length of Time Persons Remain Homeless
 - Returns to Homelessness
 - Number of those experiencing homelessness
 - Employment and Income Growth
 - First Time Homeless
 - Category 3 Activity (*not currently measured*)
 - Successful Housing Placement
4. CoC Financial Management, Cost Allowability, and Match Requirements: The CoC monitor will request one grant draw by project type from two different months during the reporting period. These selected draws will be requested 30 days in advance and should be accompanied with source documentation including proof of approved payment request and processed payment (e.g. invoices, purchase orders, contracts, receipts, payroll). Payment request forms should be included for rental assistance programs (e.g. utility deposits, security deposits, rent payment).
- The CoC Monitor will review sample transaction records to ensure that grant expenditures were eligible costs under regulations, were necessary and reasonable for proper and efficient administration of the program, were allocable to the program, and supported by adequate source documentation [2 CFR 200.403(a); 2 CFR 200.404; 2 CFR 200.405; 2 CFR 200.302(b)(3); 24 CFR 578.37; 24 CFR 578.99(e); 24 CFR 578.103(a); 24 CFR 84.21(b); 24 CFR 85.20].
 - The source documentation should support the amount drawn down from the payment requests [2 CFR 200.302(b)(3); 24 CFR 578.99(e); 24 CFR 578.103; 24 CFR 84.21(b); 24 CFR 85.20].
 - The recipient's and its subrecipients' financial records (e.g., drawdowns, unexpended balances) should match the information in HUD's financial management systems

- (e.g., Line of Credit Control System (LOCCS), Integrated Disbursement and Information System (IDIS)) for the period under review [2 CFR 200.302(b); (24 CFR 578.99(e); 24 CFR 84.21(b); 24 CFR 85.20].
- Payments for salaries and wages should be supported by documented payrolls and personnel activity reports as specified in the applicable cost principles [24 CFR 578.99(e); OMB Circular A-122, Attachment B, 8(m); OMB Circular A-87, Attachment B, 8(h)].
 - Charge to the grant for salaries and wages, whether treated as direct or indirect costs, should be based on payrolls documented in accordance with generally accepted accounting principles and approved by a responsible official(s) of the organization being monitored 24 CFR 578.59; 24 CFR 578.99(e); OMB Circular A-122, Attachment B, 8(m); OMB Circular A-87, Attachment B, 8(h)].
 - Eligible Costs: Each project type will include one or more of the following grant funds— Leasing, Rental Assistance, Operations, Supportive Services, and Administration. Each of these line items includes specific eligible costs outlined in detail in 24 CFR 578 Subpart D. The monitor will review the grant agreement and financial records to determine that costs are eligible and being expended to the correct line item. There are specific restrictions under 24 CFR 578.87(c) and 24 CFR 578.103(a) on combining grant funds. For example, Rental Assistance funds cannot be combined with either Leasing or Operations funds. Rental Assistance may only be combined with Operations for TH-RRH projects and each line item can only be funded under its specific eligible component (e.g. TH component: Operations and RRH component: Rental Assistance).
 - The CoC Monitor will review financial records to ensure that program expenses are allowable, allocable, and reasonable [24 CFR 578.99(e); 24 CFR 578.103(a)(15); 24 CFR 84.21(b)(6); 24 CFR 85.22].
 - The CoC Monitor will review financial records to identify expenditures in accounting records are aligned with eligible program activities identified in the grant agreement [24 CFR 578.37; 24 CFR 578.99(e); 24 CFR 578.103; 24 CFR 84.21(b)(2); 24 CFR 85.20]. For YHDP projects, recipient’s policies and records should reflect if one or more YHDP Special Activities have been requested and approved.
 - The CoC Monitor will review program expenditures to ensure the absence of any unallowable costs including entertainment, contributions and donations, fines and penalties, or general governmental expenditures, including salary and expenses of the chief executive officer of the recipient/subrecipient(s) [24 CFR 578.99(e); OMB Circular A-87 (for governments) or OMB Circular A-122 (for nonprofit organizations)].
 - The CoC Monitor will review program expenditures to ensure that costs related to lobbying political activities have not been charged to the program [24 CFR 578.99(e); OMB Circular A-87 (for governments) or OMB Circular A-122 (for nonprofit organizations)].
 - The CoC Monitor will also review program expenditures for approved YHDP Special Activities, CoC Rural Costs, and VAWA costs, when applicable.
 - Match Requirements: The CoC Monitor will assess a recipient and its subrecipient’s adherence to the CoC program’s match requirements and the eligibility of the program’s match expenditures.
 - The CoC Monitor will review financial records to determine that the match contributions were equal to the match required under 24 CFR 578.73(a). The recipient or subrecipient must match all grant funds, except for leasing funds, with no less than 25 percent of funds or in-kind contributions from other sources. For CoC geographic

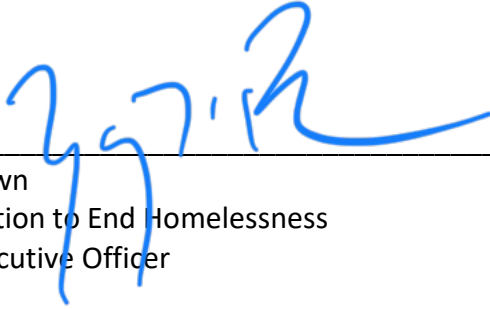
- areas in which there is more than one recipient, the 25 percent match must be provided on a grant-by-grant basis [42 U.S.C. 11386d, Section 430; 24 CFR 578.73(a); 24 CFR 578.103(a)(10)].
- The CoC Monitor will review financial records to determine that match contributions consist of cash and/or in-kind contributions from eligible non-CoC sources [24 CFR 578.73(a) and (b); 24 CFR 578.103(a)(10); 24 CFR 578.97(b); 24 CFR 84.23 or 85.24 (or, for funds awarded under the FY 2015 CoC Program Competition or later, 2 CFR 200.306)].
 - The CoC Monitor will review financial records to determine that cash match contributions from both the recipient and its subrecipients are limited to eligible CoC Program costs (i.e. costs eligible under Subpart D of the CoC Program interim rule) [24 CFR 578.73(a)].
 - The CoC Monitor will review financial records to determine that the value of each in-kind contribution was calculated properly [24 CFR 578.73(c); 24 CFR 578.103(a)(10) and 24 CFR 84.23 or 85.24 (or, 2 CFR 200.306 for grants awarded under the FY 2015 CoC Program Competition or later)].
 - The CoC Monitor will review financial records to determine that the recipient or its subrecipients have adequately documented the eligibility and value of the cash and in-kind match contributions for the operating year(s) reviewed (including, for third-party services, memorandums of understanding (MOUs) executed prior to grant agreement execution) [24 CFR 578.73(c); 24 CFR 578.103(a)(10); 24 CFR 84.23 or 85.24 (or 2 CFR 200.306 for grants awarded under the FY 2015 CoC Program Competition or later)].
 - If the recipient or subrecipient has paid the value of any real property, equipment, goods, or services contributed to the project as in-kind match, the CoC Monitor will review financial records to determine that the cost was eligible under 24 CFR part 578, Subpart D [24 CFR 578.73(c)(1)].
- Project Administrative Costs: The recipient or subrecipient may use up to 10 percent of any grant awarded under this part, excluding the amount for CoC Planning Activities and UFA costs, for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. This does not include staff and overhead costs directly related to carrying out activities eligible under 24 CFR 578.43 through 24 CFR 578.57, because those costs are eligible as part of those activities. The CoC Monitor will review financial records to ensure that project administration funds were only expended for the payment of project administration costs related to the planning and execution of CoC activities, including costs for staff and overhead directly related to carrying out overall program management, coordination, monitoring, and evaluation; providing training on CoC program requirements and attending HUD-sponsored CoC training; and carrying out environmental reviews [24 CFR 578.59(a); 24 CFR 578.99(e); 24 CFR 578.103(a)(17); 24 CFR 84.21; 24 CFR 85.20]. All administrative costs reviewed should be necessary and reasonable for the proper and efficient administration of the program [24 CFR 578.99(e); OMB Circular A-122; OMB Circular A-87].
 - The CoC Monitor will review financial policies and procedures to ensure that the CoC program funds are used in accordance with requirements and sufficient records to enable HUD and the recipients to determine whether CoC requirements are being met [24 CFR 578.103(a)].
 - The CoC Monitor will review financial records to ensure the recipient and its subrecipients maintain records that identify adequately the source and application of funds for Federally-sponsored activities. These records shall contain information pertaining to Federal awards,

- authorizations, obligations, unobligated balances, assets, outlays, income and interest [2 CFR 200.302(b)(3); 24 CFR 578.99(e); 24 CFR 578.103(a)(15); 24 CFR 84.21(b)(2); 24 CFR 85.20].
- The CoC Monitor will review financial records to ensure that cash payments are not being provided directly to the program beneficiaries, except for reasonable stipends to program participants in employment assistance and job training programs [24 CFR 578.37(a)].
 - The CoC Monitor will review financial records to ensure that the recipient and its subrecipients are compliant with the component or activity caps imposed by program regulations and that all costs subject to the expenditure caps properly classified [24 CFR 578.89; 24 CFR 578.41].
 - If indirect costs are charged to the grant program by the recipient or its subrecipients, the costs should be supported by an Indirect Cost Rate Proposal or Cost Allocation Plan prepared in accordance with OMB Circular A-87, Attachment A, Section F (for units of state and local government) or OMB Circular A-122, Attachment A, Section C (for nonprofit organizations) [24 CFR 578.99(e); OMB Circular A-87 (for governments) or OMB Circular A-122 (for nonprofit organizations)].
 - If Single Audits are required, the recipient and its subrecipients should have a system or methodology to ensure that such audits are conducted [24 CFR 578.99(g); OMB Circular A-133; 24 CFR 84.26(a); 24 CFR 85.26(b)]. There should be documentation available to demonstrate that the audits have been reviewed for compliance and that the recipient or subrecipient has taken appropriate follow-up actions, if necessary [24 CFR 578.99(g); OMB Circular A-133]. The CoC Monitor will request a copy of the agency's most recent audit prior to monitoring.
 - The CoC Monitor will request a copy of the agency's 990 prior to monitoring.
 - The CoC Monitor will request a copy of W-9 forms signed by the landlord/property management company the correspond with the client files that were selected for review.
 - Each recipient and subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or subrecipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance provided under this part [24 CFR 578.75(g)(1)].
 - The CoC Monitor will review financial records to ensure that the recipient and its subrecipients have effective internal control over, and accountability of, all grant funds, property and other assets [2 CFR 200.303; 24 CFR 578.99(e); 24 CFR 578.103(a)(15); 24 CFR 84.21(b)(3); 24 CFR 85.20].
 - The recipient and its subrecipients should have an organization chart that illustrates the actual lines of authority/responsibility.
 - Primary duties for key employees of the recipient and its subrecipients should be clearly defined.
 - The recipient's and its subrecipients' chart of accounts should include a complete listing of the account numbers used to support the controls required to ensure that resources used do not exceed resources authorized.
 - Approval controls should provide reasonable assurance that appropriate individuals approve recorded transactions in accordance with management's general or specific criteria.
 - The controls over the design and use of documents and records should provide reasonable assurance that transactions and events are properly documented, recorded, and auditable.

- In the normal course of the position's requirements, duties should be segregated to effectively reduce the opportunity for someone to perpetrate or conceal errors or irregularities.
- There should be a clear protocol for all personnel when communicating to the appropriate supervisory officials regarding operating problems and non-compliance with laws and regulations.
- Internal control procedures should support the ability to prepare financial statements that are accurately presented in conformity with generally accepted or other relevant and appropriate accounting principles and regulatory requirements. One level of assurance of the accuracy and integrity of data is provided by the recipient attaining an unqualified opinion on the audited annual financial statements and internal controls.
- Collecting and Expending Program Income: Program Income is the income received by the recipient or subrecipient directly generated by a grant-supported activity. Program income earned during the grant term shall be retained by the recipient and added to funds committed to the project by HUD and the recipient to be used for eligible activities. Rents and occupancy charges collected from program participants are program income. Program income for PSH should be specified in agency policies and intake packets as rent, and program income for TH should be specified in agency policies and intake packets as occupancy charges. Occupancy charges collected from only residents of TH may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing [24 CFR 578.97]
 - The recipient and its subrecipients must maintain records of the receipt and use of program income [2 CFR 200.302(b)(2) & (3) & (4); 24 CFR 578.97; 24 CFR 578.103(a)].
 - The recipient and its subrecipients must use program income received for eligible costs of the CoC project. Recipients or subrecipients must apply program income towards eligible costs [24 CFR 578.97; 24 CFR 578.99(e); 24 CFR 84.24(b); 24 CFR 85.25(g)].



Lauren Frederick
WV Coalition to End Homelessness
WV Balance of State Continuum of Care Director



Zach Brown
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